## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS GALVESTON DIVISION

§

Case No: 3:24-cv-00003

VIRAL DRM, LLC

Plaintiff,
v.

FRIENDLY CHEVROLET, LTD., BAILEY ADVENTURES, LTD.

Defendants.

## **NOTICE OF SETTLEMENT**

TO THE HONORABLE JEFFREY V BROWN (U.S.D.J.)

MAY IT PLEASE THE COURT, plaintiff Viral DRM, LLC ("Plaintiff") respectfully notifies the Court that the parties have reached a settlement in principle pending their negotiation of a final settlement agreement. We therefore respectfully request that the Court adjourn all pending dates and grant the parties thirty days (30) days to consummate their transaction before filing a Stipulation of Dismissal. No other dates will be impacted by this request. Defendant Friendly Chevrolet, Ltd. consents to the filing of this Notice. Defendant Bailey Adventures, Ltd. is in default and has yet to appear (but will be dismissed as part of the proposed settlement transaction).

Respectfully submitted,

## SANDERS LAW GROUP

/s/James H. Freeman/
James H. Freeman, Esq.
NY State Bar No.: 4001533
333 Earle Ovington Blvd., Ste. 402
Uniondale, NY 11553
Tel: (516) 203-7600
Email: jfreeman@sanderslaw.group

## **CERTIFICATE OF SERVICE**

Undersigned hereby certifies that a true and correct copy of the foregoing Notice of Settlement was served on all counsel of record via CM/ECF on December 11, 2024.

/s/jameshfreeman/ James H. Freeman